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File No. 098019B

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>In re:</b>	:	<b>CHAPTER 13</b>
	:	
<b>Anna M. Allaggio</b>	:	<b>CASE NO. 18-27669-vfp</b>
	:	
<b>Debtor</b>	:	<b>NOTICE OF MOTION</b>
	:	<b>TO VACATE STAY</b>
	:	
	:	<b>HEARING DATE: February 21, 2019</b>

**TO:** Stuart D. Gavzy, Esq., Marie-Ann Greenberg, Trustee, Anna M. Allaggio, Debtor and Mary Allaggio, co-Mortgagor.

PLEASE TAKE NOTICE that the undersigned, attorneys for the Mortgagee, U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT, will apply to the above-named Court at the U.S. Bankruptcy Court House, Martin Luther King, Jr., Federal Building & Courthouse, 50 Walnut Street, 3rd Floor, Newark, New Jersey, in Courtroom #3B, on February 21, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order to Vacate the Automatic Stay pursuant to II U.S.C. § 362.

This Motion is being submitted under Local Bankruptcy Rule 4001-1. An accompanying brief has not been submitted because Local Rule permits a Secured Creditor to file the instant Motion supported by a Certification attesting to the operative circumstances and the Movant's entitlement to the relief requested.

PLEASE TAKE FURTHER NOTICE that if you contest this Motion, you must appear in Court on the date noted above and you are further required to file with the Court and serve on the undersigned a written response, in accordance with Rules of Court, no later than seven (7) days prior to the hearing date pursuant to Local Bankruptcy Rule 9013-2(a)(2). If a written response is not served and filed, the Court will treat this Motion as uncontested and may not conduct a hearing.

PLUESE, BECKER & SALTZMAN, LLC

BY: /s/ Rob Saltzman  
Rob Saltzman, Esquire

DATED: January 18, 2019